

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SAKARA LINDSEY, )  
                        )  
Plaintiff,           )  
                        ) No. 1:24-cv-01984  
v.                     )  
                        ) Hon. Thomas M. Durkin  
SPEEDWAY LLC,       )  
                        )  
Defendant.           )

**JOINT MOTION TO STAY DEADLINES PENDING SETTLEMENT COMPLETION**

Plaintiff Sakara Lindsey and Defendant Speedway LLC jointly move this Court to enter an order staying all deadlines and proceedings in this case, including those contained in the Court's October 11, 2024 minute order (Doc. 39). In support of this request, the parties state as follows:

1.      Defendant's answer to the complaint is due November 8, 2024 (Doc. 39).
2.      Plaintiff and Defendant have reached an agreement to settle this matter in its entirety and are in the process of executing a settlement agreement.
3.      The parties respectfully request that the Court stay all deadlines and proceedings set out in the October 11, 2024 minute order, including the November 8, 2024 answer deadline, so that the parties can complete execution of the settlement agreement and file voluntary dismissal papers, which the parties anticipate can be completed by November 30, 2024.
4.      The parties propose filing a status report by November 30, 2024 if settlement and dismissal are not completed by that date.
5.      This request is made in good faith and not for purposes of delay.

WHEREFORE, Plaintiff and Defendant respectfully request that the Court stay all deadlines and proceedings in this case until November 30, 2024, to allow sufficient time for the parties to execute settlement paperwork and file voluntary dismissal papers.

Dated: November 6, 2024

SAKARA LINDSEY

By: /s/ David Michael Bizar

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Respectfully submitted,

SPEEDWAY LLC

By: /s/ Matthew C. Wolfe

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